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6 7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	Case No. 2:21-mj-00984-NJK
9	Plaintiff,	Stipulation for an Order
10	v.	Directing Probation to Prepare a Criminal History Report
11	JULIO CESAR PARRA-CARRILLO,	
12	Defendant.	
13		
14	IT IS HEREBY STIPULATED AND AGREED, by and between Christopher	
15	Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States	
16	Attorney, counsel for the United States of America, and Andrew Wong, Assistant Federal	
17	Public Defender, counsel for Defendant JULIO CESAR PARRA-CARRILLO, that the	
18	Court direct the U.S. Probation Office to prepare a report detailing the defendant's crimina	
19	history.	
20	This stipulation is entered into for the following reasons:	
21	1. The United States Attorney's Office has developed an early disposition	
22	program for immigration cases, authorized by the Attorney General pursuant to the	
23	PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has	
24		

1	extended to the defendant a plea offer in which the parties would agree to jointly request as	
2	expedited sentencing immediately after the defendant enters a guilty plea.	
3	2. The U.S. Probation Office cannot begin obtaining the defendant's criminal	
4	history until after the defendant enters his guilty plea unless the Court enters an order	
5	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of	
6	a defendant's initial appearance when charged by indictment.	
7	3. The U.S. Probation Office informs the government that it would like to begin	
8	obtaining the criminal history of defendants eligible for the early disposition program as	
9	soon as possible after their initial appearance so that the Probation Office can complete the	
10	Presentence Investigation Report by the time of the expected expedited sentencing.	
11	4. Accordingly, the parties request that the Court enter an order directing the	
12	U.S. Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this 23rd day of November, 2021.	
14		Respectfully Submitted,
15	RENE L. VALLADARES	CHRISTOPHER CHIOU
16	Federal Public Defender	Acting United States Attorney
17	/s/Andrew Wong	/s/ Jared L. Grimmer
18	ANDREW WONG Assistant Federal Public Defender Counsel for Defendant JULIO CESAR PARRA-CARRILLO	JARED L. GRIMMER Assistant United States Attorney
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1 **UNITED STATES DISTRICT COURT DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, Case No. 2:21-mj-00984-NJK 3 Plaintiff, **Order Directing Probation to** 4 Prepare a Criminal History Report v. 5 JULIO CESAR PARRA-CARRILLO, 6 7 Defendant. 8 9 Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served: 10 11 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a 12 report detailing the defendant's criminal history. 13 DATED this 23rd day of November, 2021. 14 15 HONORABLE NANCY J. KOPPE UNITED STATES MAGISTRATE JUDGE 16 17 18 19 20 21 22 23 24